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10 EXPERIAN INFORMATION SOLUTIONS, INC.
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EARLENE OTERO,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.; ET AL.,

Defendants.

Case No. 3:17-cv-00508-EMC

Assigned to: Judge Edward M. Chen

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

1 On January 31, 2017, Plaintiff Earlene Otero (“Plaintiff”) filed a Complaint in this action.
 2 Given the large volume of Complaints requiring a response from Defendant Experian Information
 3 Solutions, Inc. (“Experian”) at the same time, and in accordance with Local Rule 6-1(a), Plaintiff
 4 and Experian agree to an extension for Experian to answer or otherwise respond to the Complaint.
 5 Experian’s response to the Complaint is due April 3, 2017. To the extent that Experian files a
 6 motion to dismiss in this case, Experian agrees that Plaintiff shall have 30 days to respond.
 7 Experian will thereupon have 21 days for any reply.

8 Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that
 9 the deadline for Experian to answer or otherwise respond to the Complaint is extended until April
 10 3, 2017. Plaintiff’s deadline to respond to any motion to dismiss is extended to 30 days from
 11 filing, and Experian’s deadline to reply in support of a motion to dismiss is extended to 21 days
 12 from filing the opposition.

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14 Dated: March 2, 2017

/s/ Elliot W. Gale

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Attorneys for Plaintiff
 Earlene Otero

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Dated: March 2, 2017

/s/ Benjamin C. Lee

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Attorneys for Defendant
 Experian Information Solutions, Inc.

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1 **ECF CERTIFICATION**

2 I, Benjamin C. Lee, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to
3 the filing of this document has been obtained from each signatory hereto.

4 Executed on March 2, 2017, at San Francisco, California.

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6 _____
7 */s/ Benjamin C. Lee*
8 Benjamin C. Lee (SBN 282177)
9 JONES DAY

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12 Attorneys for Defendant
13 Experian Information Solutions, Inc.
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1 **[PROPOSED] ORDER**

2 The Court, having considered the parties' Joint Stipulation for Extension of Time to
3 Respond to the Complaint, hereby extends Experian Information Solutions, Inc.'s ("Experian")
4 deadline to answer or otherwise respond to the Complaint to April 3, 2017. Plaintiff's deadline to
5 respond to any motion to dismiss is extended to 30 days from filing, and Experian's deadline to
6 reply in support of a motion to dismiss is extended to 21 days from filing the opposition.

7 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

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9 DATED: 3/6/17



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